

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                               |   |                                       |
|-------------------------------|---|---------------------------------------|
| <b>RAGNAR DEVELOPMENT LLC</b> | § |                                       |
|                               | § |                                       |
| <b>v.</b>                     | § | <b>Civil Action No. 4:23-cv-02191</b> |
|                               | § |                                       |
| <b>DEUTSCHE BANK NATIONAL</b> | § |                                       |
| <b>TRUST COMPANY</b>          | § |                                       |

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**AGREED STIPULATION OF DISMISSAL WITH PREJUDICE**

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TO THE HONORABLE JUDGE KEITH P. ELLISON.:

Pursuant to the Federal Rules of Civil Procedure, Plaintiff Ragnar Development LLC and Defendant Deutsche Bank National Trust Company hereby stipulate and agree to the following:

1. Plaintiff filed its Original Petition, Application for Injunctive Relief, Demand for an Accounting, and Request for Disclosures in the 164<sup>th</sup> Judicial Court of Harris County, Texas on June 2, 2023.

2. Defendant filed its Notice of Removal on June 14, 2023.

3. Plaintiff no longer wishes to pursue its causes of action against Defendant.

4. Plaintiff as well as Defendant shall bear their own attorney's fees, expert fees, and litigation expenses incurred in litigating these claims.

5. Accordingly, Plaintiff and Defendant request that the Court dismiss Deutsche Bank National Trust Company from this lawsuit with prejudice against filing same in the future.

Based on the above, Plaintiff and Defendant Deutsche Bank National Trust Company hereby request that the Court enter the attached Order dismissing Deutsche Bank National Trust Company from the above-entitled and numbered cause without prejudice with costs of court being assessed against the party incurring same.

Respectfully submitted,

VILT LAW, P.C.

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By: /s/Melissa Gutierrez Alonso – with permission  
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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record and pro se parties via the court's electronic filing service on the 11<sup>th</sup> day of June, 2024.

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/s/ Robert C. Vilt  
ROBERT C. VILT